

From: [Tougeron, Christopher, Env. Health](#)
To: [Wickham, Jerry, Env. Health](#)
Subject: FW: GIG Facility Site Visit
Date: Wednesday, June 03, 2015 8:24:45 AM
Attachments: [GIG soil 5" lab report May 2015.pdf](#)

Thank You

Chris Tougeron
Sr. Hazardous Materials Specialist
Alameda County Department of Environmental Health
1131 Harbor Bay Parkway, Alameda, CA 94502
510-567-6804
christopher.tougeron@acgov.org

From: Jennifer Brady [mailto:jbrady@ebresources.com]
Sent: Friday, May 15, 2015 1:38 PM
To: Tougeron, Christopher, Env. Health
Cc: Shams Hasan
Subject: RE: GIG Facility Site Visit

Good afternoon Mr. Tougeron,

Apologies that the response took so long, I have been out of the office and not able to access my email. Some of your questions were answered directly in your email chain below in *blue*. Below is an expanded explanation to some of your questions as well.

As stated by E&B's Conditional Use Permit with Alameda County and the California Public Resources Code 3106, the Division of Oil, Gas, and Geothermic Resources (DOGGR) is the lead agency for oil and gas production operations, maintenance, removal and/or abandonment at the GIG lease. A formal work plan, sampling plan, and tank cleaning procedure is not required by the DOGGR for site maintenance or facilities removal. The DOGGR is required to be notified within 30 days of any facilities revision.

As a courtesy, E&B uses the Bureau of Land Management suggestions for facilities removal/upgrade when hydrocarbon impacts are observed under facilities during site maintenance. A sample of the impacted soil is taken and analyzed by a State-certified laboratory for Title 22 hazardous waste characterization. If the soil is considered non-hazardous, then a memorandum of understanding with the DOGGR is utilized to beneficially re-use the hydrocarbon containing soil as secondary containment berms. The impacted soil is excavated until background soil is determined, and an additional sample is taken to verify as non-hazardous. Clean and compatible soil is then used to backfill the excavation. The soil not required for beneficial re-use is then transported as non-hazardous waste to landfill.

Attached is a soil sample analysis taken at approximately the middle of the excavation and at 5' depth. Based on the results, the soil is considered non-hazardous and while there is a small TPH fingerprint the limits are within what would be deemed "clean" for hydrocarbon impacted soil (based on the California Underground Storage Tank soil remediation suggestions as there is no established limit for site maintenance). E&B plans to excavate a few more feet to decrease the TPH fingerprint even further, as a best practice, and then the area will be backfilled with clean soil and compacted.

Please feel free to contact me with any questions or comments.

Regards,
Jennifer Brady
Environmental Compliance Coordinator

E&B Natural Resources Management
3000 James Road
Bakersfield, CA 93308
Tel: 661.616.6176
Cell: 661.428.6146
Fax: 661.616.6179

-----Original Message-----

From: Tougeron, Christopher, Env. Health
[<mailto:Christopher.Tougeron@acgov.org>]
Sent: Tuesday, May 05, 2015 11:32 AM
To: Shams Hasan
Cc: Jennifer Brady
Subject: GIG Facility Site Visit

Mr. Hasan,

Thank you for meeting with me at the GIG facility located at 8467 Patterson Pass Road, Livermore, CA.

I have been in contact with Jennifer Brady who has provided information on soil sampling and soil disposal.

Based on our discussions during the site meeting I am following up with you to obtain additional information regarding the site activities to remove two aboveground tanks and subsequent soil excavation and disposal.

Please provide the following information / documents.

1) The work plan to remove the two aboveground tanks and soil removal.

See above narrative.

2) The sampling plan and all soil / tank bottom analysis that lead to the disposal profile.

See above narrative.

3) Location and depth of soil samples taken to date.

Two samples (composite) at 1' taken at approximate equidistance from middle to the edge, and one sample at 5' taken approximately from the middle of the excavation.

4) Notifications to/from other Agencies that approved the work plan or are overseeing the remediation

activities (County or State Departments).

See above narrative.

5) Please provide information on the water discharged from the Nissen Facility located at 8617 Patterson Pass

Road, Livermore on December 18, 2014.

The Operations Director that has information of this apparent discharge has been on vacation and I will request the information as soon as he is back.

6) Approval from a County or State Agency for reusing the excavated soils as a berm / secondary containment wall at the Nissen Facility.

I have a request to DOGGR for a copy of the MOU and will forward as soon I hear back.

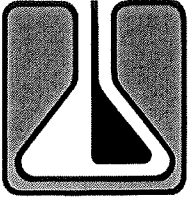
7) Tank cleaning procedures (from Doggr) that was used at the GIG Facility.

See above narrative.

Thank you for your help in clarifying the previous and current site activities.

Please let me know if you have any questions.

Chris Tougeron
Senior Hazardous Materials Specialist
Alameda County Department of Environmental Health
Ph: 510-567-6804



ZALCO LABORATORIES, INC.

Analytical & Consulting Services

4309 Armour Avenue
Bakersfield, California 93308

(661) 395-0539
FAX (661) 395-3069

May 14, 2015

Jennifer Brady
E & B Natural Resources Corp.
3000 James Rd
Bakersfield, CA 93308

TEL: (661) 428-6146
FAX: (661) 616-6179

Project ID:
RE: 1505100

Dear Jennifer Brady:

Zalco Laboratories, Inc. received 1 samples on 5/8/2015 for the analyses presented in the following report.

We appreciate your business and look forward to serving you in the future. Please feel free to call our office if you have any questions regarding these test results.

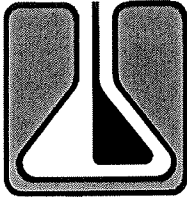
Sincerely,

A handwritten signature in black ink, appearing to read "Juan Magana". The signature is fluid and cursive, with a large, stylized initial "J" at the end.

Juan Magana
Project Manager
CC:

NSS: Non Sufficient Sample H: Exceeds Analysis Hold Time TTLC: Total Threshold Limit Concentration STLC: Soluble Threshold Limit Concentration TCLP: Toxicity Characteristic Leaching Procedure MCL: Maximum Contaminant Level *: See Case Narrative
The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

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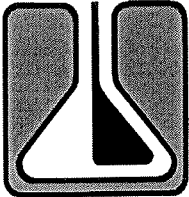
E & B Natural Resources Corp. 3000 James Rd Bakersfield, CA 93308	Project: Master-4Q2013 Project #: Attention: Jennifer Brady	Work Order No.: 1505100 Reported: 05/14/2015 Received: 05/08/2015 09:45
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Lab Sample ID: 1505100-01	Collected By: Mike Smith
Client Sample ID: GIG Soil Sample	Date Collected: 4/30/2015 12:51:00PM

Analyte	Results	PQL		Units	Flag	Method	Date Prepared	Date Analyzed	Init.
CAM, Corrosivity									
<i>22 CCR Limit</i>									
pH	7.480		<i>2 or less, 12.5 or greater</i>	pH Units	I-02	SW846 9040C	5/13/15	5/13/15	MRF
CAM, Ignitability of Solids									
Screen Test, Ignitability	Non-Flammable Under Test Conditions			N/A		SW-846 EPA 1030	5/8/15	5/8/15	JAH
Burn Rate, Ignitability	Non-Flammable Under Test Conditions			mm/sec		SW-846 EPA 1030	5/8/15	5/8/15	JAH
CAM, Reactivity									
Reactive Sulfide	<10	10		mg/kg	I-02	SW 7.3.4.2	5/13/15	5/13/15	SAM
CAM, Toxicity (17 Metals)									
<i>TTLC Limits</i>									
Antimony	<10	10	500	mg/kg		SW846 6010B	5/11/15	5/12/15	SS
Arsenic	<1.0	1.0	500	mg/kg		SW846 6010B	5/11/15	5/12/15	SS
Barium	220	5.0	10000	mg/kg		SW846 6010B	5/11/15	5/12/15	SS
Beryllium	<0.50	0.50	75	mg/kg		SW846 6010B	5/11/15	5/12/15	SS
Cadmium	<0.50	0.50	100	mg/kg		SW846 6010B	5/11/15	5/12/15	SS
Chromium	14	2.5	2500	mg/kg		SW846 6010B	5/11/15	5/12/15	SS
Cobalt	<5.0	5.0	8000	mg/kg		SW846 6010B	5/11/15	5/12/15	SS
Copper	12	2.5	2500	mg/kg		SW846 6010B	5/11/15	5/12/15	SS
Lead	6.4	2.5	1000	mg/kg		SW846 6010B	5/11/15	5/12/15	SS
Mercury	0.052	0.050	20	mg/kg		SW846 7471A	5/12/15	5/13/15	SS
Molybdenum	<5.0	5.0	3500	mg/kg		SW846 6010B	5/11/15	5/12/15	SS
Nickel	26	2.5	2000	mg/kg		SW846 6010B	5/11/15	5/12/15	SS
Selenium	<2.5	2.5	100	mg/kg		SW846 6010B	5/11/15	5/12/15	SS
Silver	<1.0	1.0	500	mg/kg		SW846 6010B	5/11/15	5/12/15	SS
Thallium	<25	25	700	mg/kg		SW846 6010B	5/11/15	5/12/15	SS
Vanadium	19	5.0	2400	mg/kg		SW846 6010B	5/11/15	5/12/15	SS
Zinc	18	2.5	5000	mg/kg		SW846 6010B	5/11/15	5/12/15	SS
Petroleum Hydrocarbons									
Diesel Range Hydrocarbons	3070	250		mg/kg		SW846 8015B	5/11/15	5/12/15	JMM
Gasoline Range Hydrocarbons	0.731	0.250		mg/kg		SW846 8015B	5/12/15	5/12/15	HLP
Motor Oil Range Hydrocarbons	5670	625		mg/kg		SW846 8015B	5/11/15	5/12/15	JMM

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E & B Natural Resources Corp. 3000 James Rd Bakersfield, CA 93308	Project: Master-4Q2013 Project #: Attention: Jennifer Brady	Work Order No.: 1505100 Reported: 05/14/2015 Received: 05/08/2015 09:45
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Lab Sample ID: 1505100-01 Client Sample ID: GIG Soil Sample	Collected By: Mike Smith Date Collected: 4/30/2015 12:51:00PM
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Analyte	Results	PQL	Units	Flag	Method	Date Prepared	Date Analyzed	Init.
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Petroleum Hydrocarbons

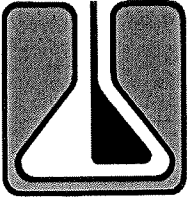
Surrogates	% Recovery	Recovery Limits	Flag
a,a,a-Trifluorotoluene	79.8	24-120	

Volatile Organic Compounds

Ethyl Acetate	<50.0	50.0	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP
Acetone	<50.0	50.0	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP
Acrolein	<20.0	20.0	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP
Acrylonitrile	<20.0	20.0	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP
Benzene	<5.00	5.00	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP
Bromobenzene	<5.00	5.00	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP
Bromochloromethane	<5.00	5.00	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP
Bromodichloromethane	<5.00	5.00	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP
Bromoform	<5.00	5.00	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP
Bromomethane	<5.00	5.00	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP
2-Butanone	<50.0	50.0	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP
tert-Butyl alcohol	<50.0	50.0	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP
n-Butylbenzene	<5.00	5.00	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP
sec-Butylbenzene	<5.00	5.00	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP
tert-Butylbenzene	<5.00	5.00	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP
Carbon disulfide	<5.00	5.00	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP
Carbon Tetrachloride	<5.00	5.00	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP
Chlorobenzene	<5.00	5.00	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP
Chloroethane	<5.00	5.00	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP
2-Chloroethyl vinyl ether	<5.00	5.00	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP
Chloroform	<5.00	5.00	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP
Chloromethane	<5.00	5.00	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP
2-Chlorotoluene	<5.00	5.00	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP
4-Chlorotoluene	<5.00	5.00	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP
Dibromochloromethane	<5.00	5.00	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP
1,2-Dibromo-3-chloropropane	<5.00	5.00	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP
1,2-Dibromoethane	<5.00	5.00	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP
Dibromomethane	<5.00	5.00	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP
1,2-Dichlorobenzene	<5.00	5.00	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP
1,3-Dichlorobenzene	<5.00	5.00	ug/kg	SW846 8260B	5/12/15	5/12/15	HLP

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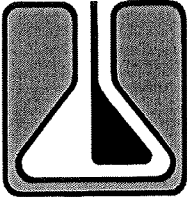
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Lab Sample ID: 1505100-01	Collected By: Mike Smith
Client Sample ID: GIG Soil Sample	Date Collected: 4/30/2015 12:51:00PM

Analyte	Results	PQL	Units	Flag	Method	Date Prepared	Date Analyzed	Init.
Volatile Organic Compounds								
1,4-Dichlorobenzene	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
Dichlorodifluoromethane	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
1,1-Dichloroethane	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
1,2-Dichloroethane	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
1,1-Dichloroethene	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
cis-1,2-Dichloroethene	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
trans-1,2-Dichloroethene	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
1,2-Dichloropropane	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
1,3-Dichloropropane	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
2,2-Dichloropropane	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
1,1-Dichloropropene	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
Di-isopropyl ether	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
cis-1,3-Dichloropropene	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
trans-1,3-Dichloropropene	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
Ethyl tert-Butyl Ether	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
Ethyl Benzene	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
Hexachlorobutadiene	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
2-Hexanone	<50.0	50.0	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
Iodomethane	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
Isopropylbenzene	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
4-Isopropyltoluene	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
Methylene Chloride	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
4-Methyl-2-pentanone	<50.0	50.0	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
Methyl tert-Butyl Ether	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
Naphthalene	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
n-Propylbenzene	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
Styrene	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
Tert-Amyl Methyl Ether	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
1,1,1,2-Tetrachloroethane	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
1,1,1,2-Tetrachloroethane	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
Tetrachloroethene	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
Toluene	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
1,2,3-Trichlorobenzene	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
1,2,4-Trichlorobenzene	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
1,1,1-Trichloroethane	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP

NSS: Non Sufficient Sample H: Exceeds Analysis Hold Time TTLC: Total Threshold Limit Concentration STLC: Soluble Threshold Limit Concentration TCLP: Toxicity Characteristic Leaching Procedure MCL: Maximum Contaminant Level *: See Case Narrative
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Lab Sample ID: 1505100-01	Collected By: Mike Smith
Client Sample ID: GIG Soil Sample	Date Collected: 4/30/2015 12:51:00PM

Analyte	Results	PQL	Units	Flag	Method	Date Prepared	Date Analyzed	Init.
Volatile Organic Compounds								
1,1,2-Trichloroethane	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
Trichloroethene	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
Trichlorofluoromethane	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
1,2,3-Trichloropropane	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
1,2,4-Trimethylbenzene	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
1,3,5-Trimethylbenzene	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
Vinyl acetate	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
Vinyl chloride	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
o-Xylene	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
Xylenes, total	0.00		ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
m,p-Xylene	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP
1,1,2-Trichloro-1,2,2-Trifluoroethane	<5.00	5.00	ug/kg		SW846 8260B	5/12/15	5/12/15	HLP

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CHAIN OF CUSTODY, ID#

1505100

Page _____ of _____

Zalco Lab # _____

Client PO # _____

PROJECT ID: _____

QUOTE ID: _____

REPORT INFO	INVOICE INFO	ANALYSIS							
Client: <u>E: B Natural Resources</u>	Invoice To: <u>Same as Client</u>	# OF CONTAINERS	CAMEL	CIT	reactive sulfide	identifiability	N/A	TPT	TEMPERATURE (C)
Address: <u>1600 Norris Rd</u>	Address:								
City, State, Zip: <u>Bakersfield</u>	City, State, Zip:								
Attention: <u>Jennifer Brady</u>	Attention:								
Phone: Results <input type="checkbox"/>	Phone:								
Fax: Results <input type="checkbox"/>	Fax:								
Email: Results <input checked="" type="checkbox"/> <u>jbrady@ebresources.com</u>	Email:								

COMMENTS:

Turnaround Time: Routine 10 working days

Rush By _____ working days

Send Copy to State of CA? Yes No

Attention To: _____

Send Copy to County? Yes No

County _____

SAMPLED BY: Mike Smith EMPLOYED BY: E: B

Sample No. *	Sample Description	Sample		Type*	#	OF	CONTAINERS	TEMPERATURE (C)	
		Date	Time						
1	G/G soil sample	4/20/15	12:5	S	1	X	X	X	22.4

RELINQUISHED By: Signature	PRINT	COMPANY	Date	Time	RECEIVED By: Signature	PRINT
<u>Jennifer Brady</u>	Jennifer Brady	E: B	5/1/15	0945	<u>K. Springman</u>	K Springman

NOTE: Samples are discarded 30 days after results unless other arrangements are made. Hazardous samples will be returned to client or disposed of at the client's expense.

*Sample Type Key: AQ-Aqueous; BS-Biosolid; DW-Drinking Water; GW-Ground Water; G-Gas; LPG-Liquid Petroleum Gas; OL-Oil; O-Other; P-Petroleum; S-Soil/Solid; ST-Storm Water; WW-Wastewater

*Sample No.: FOR OFFICE USE ONLY